

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHELLE CLARK,

-against-

TARGET CORPORATION,

Plaintiff,

Defendant.

Case No.: 1:18-cv-05865-NRB-OTW

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the annexed Affirmation of Alice Spitz, Esq., dated September 16, 2019, together with the exhibits annexed thereto, the Rule 56.1 Statement dated September 16, 2019, the annexed Memorandum of Law dated September 16, 2019, and upon the directives of the Honorable Judge Naomi R. Buchwald at the Pre-Motion Conference July 25, 2019, and upon all prior pleadings and proceedings, the undersigned will move this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, before Honorable Judge Naomi R. Buchwald, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order: Granting summary judgment in favor of defendant TARGET CORPORATION (hereinafter referred to as "TARGET"), and dismissing the plaintiff's Complaint as against TARGET; together with such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 16, 2019

Yours etc.,
MOLOD SPITZ & DeSANTIS, P.C.

By: _____ /s/
Alice Spitz (AS - 5155)
Attorneys for Defendant
TARGET CORPORATION
1430 Broadway, 21ST Floor
New York, NY 10018

Tel No.: 212-869-3200
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To:

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